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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WILLIAM BERRY, JR.,

Plaintiff,

VS.

AARGON AGENCY, INC; PLUSFOUR, INC;
QUANTUM COLLECTIONS; AND
RICHLAND HOLDINGS, INC DBA
ACCOUNTCORP OF SOUTHERN NEVADA

Defendants.

Case No.: 2:20-cv-02144-APG-EJY

**JOINT MOTION FOR EXTENSION OF
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT PLUSFOUR,
INC'S MOTION TO DISMISS**

(First Request)

WILLIAM BERRY, JR (“Plaintiff”) and Defendant PLUSFOUR, INC. (“Plusfour”), collectively the “Parties”, hereby jointly submit this motion (“Joint Motion”) for a two-week extension of time for Plaintiff to file a response to Plusfour’s Motion to Dismiss or in the Alternative Motion for Summary Judgment (“Motion to Dismiss”) to **January 13, 2021**. Additionally, Plusfour’s reply brief, if any, shall be likewise extended for two weeks to **February 10, 2021**. The Motion to Dismiss was filed on December 16, 2020 and appears on the docket as ECF #8. Plaintiff’s current deadline to respond to the Motion to Dismiss is December 30, 2020.

The reason for the request is because counsel for Plaintiff needs additional time to communicate with Plaintiff about the issues raised in the Motion to Dismiss, and fully examine and respond to the arguments and legal analysis set forth in the Motion to Dismiss and evaluate whether dismissal or an amended pleading would resolve the issues raised in the Motion to Dismiss. The Parties also request an extension to fully consider and brief the summary judgment issues presented. This is Parties' first request for an extension and this Joint Motion has not been submitted for the purpose of delay or other impermissible purpose. Plusfour will not be prejudiced by the delay and has agreed to the extensions of time. Additionally, the requested extensions do not prejudice or directly affect the other Defendants in this case. Accordingly, it is requested that the Court grant the extension of time to respond to the Motion to Dismiss to January 13, 2021 and any reply brief to February 10, 2021.

Dated: December 29, 2020.

Submitted By:

/s/ Shawn W. Miller
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No Opposition:

/s/ Garrett R. Chase
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ORDER GRANTING EXTENSION OF TIME

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

Dated: December 29, 2020